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*Attorneys for Defendants Thomas  
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Alexander Holmes, Rafael Dias  
Monteleone, Santhiran Naidoo, Enrique  
Romualdez, and Lucas Vasconcelos*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG; ILIOS  
CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS

Case No. 2:24-cv-8280-MWC-E

**DECLARATION OF GRANT  
FONDO IN SUPPORT OF  
DEFENDANTS THOMAS  
PATRICK FURLONG, ILIOS  
CORP., MICHAEL ALEXANDER  
HOLMES, RAFAEL DIAS  
MONTELEONE, SANTHIRAN  
NAIDOO, ENRIQUE  
ROMUALDEZ, AND LUCAS  
VASCONCELOS'S OPPOSITION  
TO PLAINTIFF'S *EX PARTE*  
APPLICATION FOR TEMPORARY  
RESTRAINING ORDER**

1 VASCONCELOS,

2 Defendants.

Judge: Hon. Michelle Williams Court  
Date: June 13, 2025  
Time: 9:00 a.m.  
Courtroom: 6A, 6th Floor

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4 Complaint Filed: Sept. 25, 2024

Am. Complaint Filed: Jan. 27, 2025

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1 I, Grant P. Fondo, declare as follows:

2 1. I am a partner with the law firm Goodwin Procter LLP and a member of  
3 the bar of this Court. Goodwin Procter LLP represents Defendants Thomas Patrick  
4 Furlong, Ilios Corporation, Michael Alexander Holmes, Rafael Dias Monteleone,  
5 Santhiran Naidoo, Enrique Romualdez, and Lucas Vasconcelos (collectively, the  
6 “Individual Defendants”) in the above-captioned matter. I submit this Declaration in  
7 connection with the Individual Defendants’ Opposition to Plaintiff’s, Electric  
8 Solidus, Inc. d/b/a Swan Bitcoin (“Swan”) *Ex Parte* Application for Temporary  
9 Restraining Order. Unless stated otherwise, this Declaration is based on my personal  
10 knowledge; if called as a witness I could and would testify as follows.

11 2. On June 11, 2025, Stacylyn Doore of Quinn Emanuel, counsel for Swan,  
12 called me to notify me about Swan’s intent to file an *Ex Parte* Application for  
13 Temporary Restraining Order. Ms. Doore specifically stated that Swan’s application  
14 was not against the Individual Defendants, and that it applied to Proton only. Ms.  
15 Doore also stated that Swan intends to seek the testimony of Alex Holmes and  
16 Santhiran Naidoo at a preliminary injunction hearing.

17 3. I declare under penalty of perjury under the laws of the United States of  
18 America that the foregoing is true and correct.

19  
20 Executed on June 12, 2025.

21 /s/ Grant P. Fondo  
22 Grant P. Fondo